

Chin, Vivian

From: Haklar, James
Sent: Wednesday, May 21, 2014 1:47 PM
To: Finnegan, Ann; Chin, Vivian
Subject: FW: PCB RAW submittal Veterans Field 1167 River Road, Edgewater, NJ

From: Haklar, James
Sent: Friday, February 28, 2014 4:19 PM
To: Pete Lakatos
Subject: RE: PCB RAW submittal Veterans Field 1167 River Road, Edgewater, NJ

Dear Mr. Lakatos,

Pursuant to the PCB regulations the cleanup plan must be submitted to the Regional Administrator of EPA Region 2. Please send a hard copy to:

Judith Enck, Regional Administrator
U.S. EPA Region 2
290 Broadway, 26th Floor
New York, NY 1007-1866

You may also send a hard copy to:

John Gorman, Chief
Pesticides and Toxic Substances Branch
U.S. EPA Region 2
2890 Woodbridge Avenue, M.S.-105
Edison, New Jersey 08837-3679

Sincerely yours,

Jim Haklar

James S. Haklar, Ph.D.
Sr. PCB Disposal Specialist
Division of Enforcement and Compliance Assistance

(732) 906-6817

From: Pete Lakatos [<mailto:plakatos@termsconsulting.com>]
Sent: Thursday, February 27, 2014 12:37 PM

To: 'haklar.james@epa.gov'
Cc: Ron Dooney; Pete Lakatos
Subject: FW: PCB RAW submittal Veterans Field 1167 River Road, Edgewater, NJ

James Haklar
Regional Manager
United States Environmental Protection Agency.,
Region 2 - Edison, NJ Environmental Center
2890 Woodbridge Ave.
Edison, NJ 08837-3679
(732) 906-6817

Re: Veterans Field-RAW Submittal
1167 River Road
Edgewater, NJ

Dear Mr. Haklar

Terms Environmental Services Inc. (TERMS) is requesting approval from the United States Environmental Protection Agency (USEPA) for a risk based disposal of polychlorinated biphenyl (PCB) contaminated waste to generated by soil remedial activities at the above referenced site.

This risk based remediation/disposal approval request is being submitted in accordance with the Toxic Substances Control Act (TSCA) regulations presented in 40 code of Federal Regulations(CFR)761.61(c). A detailed Remedial Action Work Plan (RAWP) is provided as an attachment to this letter.

This risk-based cleanup application pursuant to 40 CFR76.61(c) meets the self implementing as a high occupancy area (HOA) onsite cleanup and disposal requirements of 761.61(a) with the exception of the classification sampling in accordance with (40 CFR 761.260) Subpart N, as the location of the imported material is known and area to be remediated has been delineated and verification sampling in accordance with the (40 CFR 761.260) Subpart O, grid spacing requirements based on the large area to be remediated and guidance provided by NJDEP. The soils in the areas of concern that contain PCB contamination will be remediated to below the current NJDEP's Residential Standards of 0.2 mg/kg. In addition the PCB remediated areas will be capped with a filter fabric/demarcation barrier andh a minimum of 2ft Certified Clean Fill to facilitate the Historic Fill remedial requirements..

Per the USEPA 761.61© Checklist & NJDEP Technical Regulations, a Fact Sheet has been prepared to update the Notification and Public Outreach requirement for sites undergoing an environmental investigation /remediation.

Written certification that all plans, procedures and related documents and data are on file at the remediation location will be provided..

The schedule for completing this remediation and restoration, contingent upon receiving EPA's approval and anticipated contractors schedule is planned for July-August 2014.

RAW Summary

From September to November 2013, TERMS collected a total of approximately 150 soil samples for analysis to properly identify/classify the vertical and horizontal limits of the PCB contaminated areas. The investigation laboratory data packages from Alpha Analytical Labs have been validated by DDMS to confirm the laboratory result data.

Based on these findings, an estimated minimum volume of 25,000 cubic yards of soil contain elevated PCB levels..

The proposed remediation calls for the excavation, proper disposal and post excavation verification sampling of all previously identified soil with PCB concentrations above the residential standard of 0.2 mg/kg.

1. The Company/Contractor retained to perform the remediation will provide the actual schedule and costs for construction/excavation activities to remove & load out 25,000 cy waste which will need to include address the following.
 - a. Soil Erosion Plan and Engineering Controls.
 - b. The entire site will be encompassed by silt fence, impacted areas will be covered in plastic and soils being remediated will be sprayed with water to control dust mitigate exposure.
 - c. An exclusion zone, tracking pad and decontamination area will be established.
 - d. Site Restoration will require the replacement of filter fabric/demarcation barrier, Quarry Supplied Certified Clean Fill for cap. Supplying Pre -Approved Top Soil (where required by contract documents) and leveling the entire to final grade.
2. TERMS will provide the Health and Safety Oversight.
 - a. A Site Activity Specific Health and Safety Plan (HASP) will be developed by TERMS to ensure the protection of the health and safety of all persons involved with the PCB soil investigation/remediation. Adherence to the procedures outlined in this HASP will also assure the protection of the general public while these activities are carried out.
 - b. Community Air Monitoring Program (CAMP) maintained by TERMS.
3. TERMS will provide the environmental oversight for Remediation.
 - a. The required cleanup level will be performed utilizing the Self Implementing Option (40 CFR 761.61(a)): as a high occupancy area (HOA).
 - b. Manifested Waste by licensed carriers disposed at TSCA-approved facility. (T&D estimated at \$185/Ton, Beneficial Soil Solutions, Inc. 12170 Mount Albert Road Ellicott City, MD 207420). Waste class samples will be collected and analyzed per facility requirements. Please note that actual remediation/disposal costs will need to be obtained from the contractor(s) who will ultimately be performing the PCB remediation.
 - c. Verification sampling of PCBs will be performed (per RAW -SOP and QA/QC) after remediation to assess achievement of remediation goals based on procedures as described in Subpart O (40 CFR

761.260) and NJDEP Technical Requirements for Site Remediation 7:26E. (30' x 30' grid / Minimum of 450 Post Excavation samples – PCB Metal Pest PAH Dioxin/Furans)

- d. Report preparation and issuance of Response Action Outcome (RAO) for the PCB area of concern

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

TERMS Environmental Services, Inc.

Ronald Dooney, LSRP
TERMS Environmental Services Inc.
599 Springfield Ave. Berkeley Heights, NJ.
908-464-0028

rdooney@termsconsulting.com

From: Pete Lakatos
Sent: Friday, October 18, 2013 1:31 PM
To: 'haklar.james@epa.gov'
Subject: Summary PCB Contamination 1167 River Road, Edgewater, NJ

PCB contamination/NJDEP Case # 13-10-03-1252-52
Veterans Field
1167 River Road
Edgewater, NJ

Dear Mr. Haklar:

My name is Pete Lakatos, Project Manager from TERMS Environmental Services Inc.. Our company has been retained by the Township of Edgewater, NJ to oversee a PCB remediation at the above referenced sight. Ronald Dooney, the LSRP from our company, has contacted and updated the NJDEP PCB Coordinator Kevin Schick during the recent federal furlough. He advised us to get in contact with you as soon as you became available. I have provided a summary of the activities that are underway at the site, and will be working on a RAW for submittal and your review. Please let me know if you require any additional information in regards to this project at this time. I would greatly appreciate it if you could contact me with any guidance or requirements that can assist me in this remediation.

Thank You

Pete Lakatos
Project Manager
TERMS Environmental Services Inc.
599 Springfield Ave. Berkeley Heights, NJ.
908-464-0028
908-447 4542 (cell)
plakatos@termsconsulting.com

BACKGROUND

The site was undergoing a soil remediation project designed to cover historic fill soils with a clean fill cap. During this process, it appears that PCB contaminated soil/crushed concrete was imported to the site.

It was reported that several loads of fill material were imported to the site and placed prior to analysis and approval. As these activities were performed on unscheduled work days, the source of this material could not be confirmed and the amount imported or placement locations could not be verified.

INITIAL INVESTIGATIONS

Samples from three (3) piles of this suspect material, which were not spread, were collected and analyzed. Sample results revealed that PCB concentrations ranged from 100 mg/kg to 450 mg/kg. These piles were visually classified as crushed concrete.

In order to determine the potential extent of contamination, several locations, in which recent construction activities occurred, were tested. The results of this preliminary investigation point to three basic types of impacts.

1. Crushed concrete with elevated PCB levels of 100-450 mg/kg utilized as base material for concrete sidewalks and cement pads. These levels and appearance were consistent with the tested piles and indicated that the concrete was the highest PCB level source.
2. A combined concrete, soil and other aggregate characterization. This material was utilized as lift material on the field and under paved areas. These impacts ranged from 10 mg/kg-350 mg/kg with the average PCB concentration in the 50 mg/kg range. These concentrations suggest that the contaminated concrete source material was blended with previously approved clean soils or additional amounts of moderately contaminated soils/aggregate were imported.
3. Surface impacts resulting from cross contamination from construction activities. The multiple placement sites, several crushing and sifting operations combined with vehicle traffic and material movement increased the potential for spread of contaminants.

REMEDIAL INVESTIGATION/CLASSIFICATION

On October 15 and 16, 2013, representatives from TERMS were present on site to further investigate and verify these findings. Over one hundred soil samples were collected as a requirement to classify the site. Soil borings were advanced in previously identified areas in an effort to determine the horizontal limits of contamination. Additional soil samples were collected adjacent to the known impact areas in order to assist in vertical delineation. Soils visually identified to contain suspect material were also tested. Areas that appeared not to be visually impacted were also tested to verify the contamination limits.

The laboratory results of this investigation are due on October 25, 2013. The results of this investigation will be reviewed to determine if additional investigation sampling is required.

REMEDIAL INVESTIGATION/ACTION WORKPLAN

Upon receipt of the final investigation/delineation sample results TERMS will develop a Remedial Action Workplan (RAW) to address this issue in accordance with NJDEP and EPA rules, regulations and guidance. The proposed remediation will recommend excavation of all identified soil with PCB contamination and proper disposal of this soil.

